

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

RUPERT RICKARDS,

Plaintiff,

v.

EQUIFAX INFORMATION SERVICES, LLC;
EXPERIAN INFORMATION SOLUTIONS,
INC.; TRANS UNION, LLC, COLUMBIA DEBT
RECOVERY, LLC; and IQ DATA
INTERNATIONAL, INC.,

Defendants.

Case No.

Electronically Filed

NOTICE OF REMOVAL

Pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, Defendant Trans Union, LLC, (“TransUnion”) by and through its undersigned counsel, hereby removes this action filed by Plaintiff Rupert Rickards (“Plaintiff”) from the Circuit Court for Montgomery County, Maryland to the United States District Court for the District of Maryland. In support of this Notice of Removal, TransUnion states the following:

1. On January 19, 2024, Plaintiff served TransUnion with a Summons and Complaint filed in the Circuit Court for Montgomery County, Maryland, as Case No. C-15-CV-24-000081. A copy of the Summons and Complaint are attached hereto as **Exhibit A**. No other process, pleadings, or orders have been served on TransUnion.

2. Attached hereto as **Exhibit B** is a copy of TransUnion’s Notice of Filing Notice of Removal to be filed in the Circuit Court for Montgomery County, Maryland, Case No. C-15-CV-24-000081.

3. Plaintiff's Complaint makes claims under, and alleges that Trans Union violated the Fair Credit Reporting Act, 15 U.S.C. § 1681 *et seq.* ("FCRA"). *See* Exhibit A, § Endorsed Complaint.

4. This Court has original jurisdiction over the subject action pursuant to 28 U.S.C. § 1331 since there is a federal question. As alleged, this suit falls within the FCRA, which thus supplies this federal question.

5. Pursuant to 28 U.S.C. § 1441, *et seq.*, this cause may be removed from the Circuit Court for Montgomery County, Maryland to the United States District Court for the District of Maryland.

6. Removal is timely under 28 U.S.C. § 1446 because this Notice of Removal is filed within 30 days after TransUnion's receipt of a copy of the Complaint filed in the Circuit Court for Montgomery County, Maryland.

7. Pursuant to 28 U.S.C. § 1446, Equifax Information Services, LLC, Experian Information Solutions, Inc., Columbia Debt Recovery, LLC, and IQ Data International, Inc. (collectively, the "Co-Defendants") have consented to the removal of the Action to the United States District Court for the District of Maryland. Attached hereto as **Exhibit C** are Co-Defendants' Consent to Removal Forms.

8. Copies of this Notice of Removal shall forthwith be served upon Plaintiff, Co-Defendants, and the Clerk of Court for the Circuit Court for Montgomery County, Maryland.

WHEREFORE, TransUnion removes this civil action from the Circuit Court for Montgomery County, Maryland to the United States District Court for the District of Maryland.

Date: February 16, 2024

Respectfully submitted,

BUCHANAN INGERSOLL & ROONEY PC

/s/ Geoffrey G. Grivner

Geoffrey G. Grivner (MD Fed. Bar No. 20174)

500 Delaware Avenue, Suite 720

Wilmington, DE 19801-7407

Tel.: 302-552-4207

Fax: 302-552-4295

Email: geoffrey.grivner@bipc.com

Counsel for Defendant Trans Union, LLC

CERTIFICATE OF SERVICE

The undersigned further certifies that a true copy of the foregoing was served on the following parties via First Class, U.S. Mail, postage prepaid, and/or e-mail on the 16th day of February, 2024, properly addressed as follows:

Rupert Rickards
8342 Broderick Circle
Gaithersburg, MD 20877
Pro Se Plaintiff

Joy C. Einstein
Drew T. Ricci
SHULMAN ROGERS
12505 Park Potomac Avenue, 6th Floor
Potomac, MD 20854
(301) 945-9250
jeinstein@shulmanrogers.com
dricci@shulmanrogers.com
*Counsel for Experian Information Solutions,
Inc.*

Susie Youn
**WINGET, SPADAFORA, &
SCHWARTZBERG, LLP**
2440 Junction Place, Suite 102
Boulder, CO 80301
(720) 699-1801
youn.s@wssllp.com
Counsel for IQ Data International, Inc.

Tony Torain
POLSINELLI PC
1401 Eye Street, N.W., Suite 800
Washington, D.C. 20005
(202) 626-8378
twtorain@polsinelli.com
*Counsel for Equifax Information Services,
LLC*

Mark T. Case, General Counsel
COLUMBIA DEBT RECOVERY LLC
(425) 890-2817
mcase@genesiscrcd.com
*General Counsel for Columbia Debt
Recovery, LLC*

Geoffrey G. Grivner
Geoffrey G. Grivner, Esq.

Counsel for Defendant Trans Union, LLC